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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

CAMERON KING, *individually and on behalf
 of all others similarly situated,*

Plaintiff,

v.

PAYPAL HOLDINGS, INC. and PAYPAL,
 INC.,

Defendants.

Case No. 5:25-cv-00581-BLF

**PLAINTIFF, CAMERON KING'S
 RESPONSE TO JOINT MOTION TO
 CONSOLIDATE CASES**

Date: May 8, 2025

Time: 9:00 a.m.

Location: Courtroom 3 – 5th Floor

Hon. Beth Labson Freeman

On January 22, 2025, the plaintiffs in *Silva v. PayPal*, No. 5:24-cv-09510-BLF (N.D. Cal.), *GamersNexus LLC v. PayPal Holdings, Inc., et al.*, No. 5:25-cv-00114-BLF (N.D. Cal.), *Young v. Paypal, Inc., et al.*, No. 5:25-cv-00124-BLF (N.D. Cal.), *Coleman v. PayPal Inc., et al.*, No. 5:25-cv-00367-BLF (N.D. Cal.), *Moran v. PayPal, Inc., et al.*, No. 5:25-cv-00476-BLF (N.D. Cal.), *Lyon Fitness v. PayPal, Inc., et al.*, No. 5:25-cv-00501-BLF (N.D. Cal.), *Oganesyan, et al. v. PayPal, Inc., et al.*, No. 4:25-cv-00518-BLF (N.D. Cal.), *Brevard Marketing v. PayPal, et al., Inc.*, No. 5:25-cv-00573-BLF (N.D. Cal.), and *Wendover Productions, LLC, et al. v. PayPal Inc.*, No. 5:24-cv-09470-BLF (N.D. Cal.) filed an unopposed Joint Motion for Consolidation of Actions and to Set Process for Appointment of Interim Class Counsel (“Joint Motion”), ECF No. 38.

Plaintiff King files this response in support of the Joint Motion, and respectfully requests that the Court grant the Joint Motion and enter an order: (1) consolidating the Related Actions, and any future related actions filed in, removed to, or transferred to this Court, pursuant to Fed. R. Civ. P. 42(a) under the docket of the first-filed *Wendover* action, and recaption the action *In re PayPal Honey Browser Extension Litigation* and (2) setting a schedule for counsel to file motions to appoint interim class counsel. Plaintiff King agrees that consolidation and appointment of interim class counsel is appropriate.

Dated: January 24, 2025

Respectfully submitted,

/s/ Amanda V. Boltax

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ATTESTATION OF FILER

I, Amanda V. Boltax, am the ECF user whose ID and password are being used to file this document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Amanda V. Boltax
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